

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
(PHILADELPHIA)**

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IN RE:  
**Paul Mackenzie & Monica Mackenzie**  
Debtors

CHAPTER 13

CASE NO.: 19-17027-amc

HEARING DATE: March 31, 2020

TIME: 11:00 AM

LOCATION: COURTROOM #4

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2014-2 (“Movant”) has filed a Motion for relief from the automatic stay provisions of 11 U.S.C. § 362(a) with respect to real Mortgaged Premises located at 300 Kennard Road, Perkasie, PA 18944.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before March 16, 2020 you or your attorney must do all of the following:

- (a) file an answer explaining your position at:  
U.S. Bankruptcy Court  
Eastern District of Pennsylvania  
Bankruptcy Clerk of Courts  
900 Market Street, Suite 204  
Philadelphia, PA 19107

If you mail your answer to the Bankruptcy Clerk’s office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's Attorney:  
Michael J. Shavel, Esquire  
Hill Wallack, LLP  
777 Township Line Road, Suite 250  
Yardley, PA 19067  
215-579-7700  
(215)579-9248 (FAX)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Judge Ashely M. Chan on March 31, 2020 at 11:00 a.m., Courtroom #4, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

By: /s/ Michael J. Shavel  
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